

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

JACOB DOE

Plaintiff,

v.

No. 1:23-cv-00041

THE UNIVERSITY OF NORTH  
CAROLINA SYSTEM, et al.

Defendants.

**ACLU OF NORTH CAROLINA LEGAL FOUNDATION'S AND  
FREEDOM OF THE PRESS FOUNDATION'S MOTION FOR  
LEAVE TO AMEND *AMICI CURIAE* BRIEF OPPOSING  
PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY INJUNCTION**

The American Civil Liberties Union of North Carolina Legal Foundation (ACLU-NCLF) and Freedom of the Press Foundation (FPF) respectfully move for leave to amend *amici's* previously accepted *amici* brief opposing Plaintiff Jacob Doe's Motion for a Temporary Restraining Order and Preliminary Injunction (ECF 49). The Court has already accepted *amici's* brief (Text Order, Oct. 10, 2023). *Amici* now seek to update their discussion to reflect the Temporary Restraining Order

entered by the Court on October 11 (ECF 57), and the intervening Fourth Circuit decision in *Doe v. Doe*, No. 23-1058 (4th Cir. Oct. 26, 2023). *Amici* request that this Court grant them leave to file the attached amended brief and consider the brief's arguments when deciding whether to grant Plaintiff's Motion for a Preliminary Injunction.

Pursuant to LCvR 7.1(b), proposed amicus informed counsel for the parties of their intent to file this motion on November 13, 2023. Defendants have informed *Amici* that they do not oppose the motion. As of this filing, Plaintiff has yet to state his position on this motion.

Respectfully submitted this 15th day of November 2023 by:

**ACLU OF NORTH  
CAROLINA LEGAL  
FOUNDATION**

/s/ Kristi L. Graunke\*

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NCLF and Freedom of the Press  
Foundation*

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was on this day filed in in the Western District of North Carolina using the Clerk's CM/ECF system, which will send notification of this filing to counsel for the parties.

Signed this 15th day of November, 2023

/s/ Kristi Graunke